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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

**PORTLAND GENERAL ELECTRIC
COMPANY**, an Oregon corporation;

Plaintiff,

v.

STATE OF OREGON, by and through **THE
OREGON DEPARTMENT OF STATE
LANDS** and +/- **FIVE ACRES OF
UNIMPROVED LAND ALONG THE
WILLAMETTE RIVER NEAR WEST
LINN, OREGON**;

Defendants,

and

**CONFEDERATED TRIBES OF THE
GRAND RONDE COMMUNITY OF
OREGON**, a federally-recognized Indian
tribe,

Intervenor-Defendant.

Case No. 3:22-cv-00533-SI

**JOINT MOTION TO EXTEND
FACT DISCOVERY DEADLINE**

LR 7.1 CERTIFICATION

In accordance with LR 7-1, the parties have conferred regarding this Motion and jointly request that the Court extend the fact discovery deadline as proposed below.

MOTION

Pursuant to Fed. R. Civ. P. 16 and LR 16-3(a), the parties jointly request an extension of the fact discovery deadline.

Activity	Current Deadline	Requested Deadline
Fact Discovery Deadline	January 5, 2023	March 17, 2023

The parties request an extension of the fact discovery deadline for two reasons. First, given the scope of Intervenor-Defendant's requests for production of documents, Plaintiff requires more time to collect, review, and produce documents. In Plaintiff's initial search for responsive documents, Plaintiff identified 100 gigabytes of data and anticipates identifying even more data as Plaintiff continues to run searches. Running the searches takes time, and reviewing the data takes additional time. An extension of the discovery deadline will allow Plaintiff thoroughly to complete collection, review, and production.

Second, even after Plaintiff finishes production of documents, Intervenor-Defendant requires time to review the documents before the discovery deadline. Without time to review the documents, Intervenor-Defendant cannot identify whether additional fact discovery is necessary.

The parties request an extension of the fact discovery deadline in good faith and not for the purposes of delay. The parties do not expect this extension to affect any other case deadlines. Accordingly, the parties request that the Court extend the fact discovery deadline up to and including March 17, 2023.

DATED: December 19, 2022.

**OREGON DEPARTMENT OF
JUSTICE**

By: /s/ Nina R. Englander

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*Confederated Tribes of the Grand Ronde
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